

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-md-03047-YGR

MDL No. 3047

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This Document Relates to:

ALL ACTIONS

**PLAINTIFFS' FIFTH SET OF  
INTERROGATORIES TO THE TIKTOK  
DEFENDANTS**

**PROPOUNDING PARTY: PI and SD Plaintiffs**

**RESPONDING PARTY: Defendant TikTok, Ltd.; TikTok, LLC; TikTok, Inc.;  
ByteDance, Ltd.; and ByteDance Inc.**

**SET NUMBER: 5**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiffs hereby deliver the following Second Set of Interrogatories to Defendants TikTok, Ltd.; TikTok, LLC; TikTok, Inc.; ByteDance, Ltd.; and ByteDance Inc. ("TikTok Defendants"). Responses to these Interrogatories shall be delivered electronically to the undersigned within thirty (30) days of the date of service hereof or as otherwise mutually agreed by the parties.

**I. DEFINITIONS**

1. "Candidate Pool" means the set of videos that are eligible to undergo retrieval and ranking.

2. "Child" or "Children" means individual(s) under the age of thirteen (13).

1           3.       **“Date”** means the exact day, month, and year, if ascertainable, or if not, the best  
2 approximation (including relationship to other events, with the indication that it is an  
3 approximation).

4           4.       **“Document”** and **“Documents”** are synonymous in meaning and equal in scope to  
5 the usage of those terms in Fed. R. Civ. P. 34 and the Local Rules (and, as applicable, to the usage  
6 of the term “writing” in California Evidence Code 250) and include ESI and Communications.

7           5.       **“Identify”** means to provide the Identity.

8           6.       **“Identity”** means:

9           a.       with respect to natural Person(s): (i) their full name; (ii) their present or last known  
10 address; (iii) all title(s)/position(s) and dates they held; (iv) their present and past place in Your  
11 structure/hierarchy including Units; (iv) the Identity of Person(s) to whom they report or reported  
12 directly or indirectly (**“Reporting Relationships”**); (v) the Identity of Person(s) that report or  
13 reported to them directly or indirectly (**“Supervisory Relationships”**); (vi) their present and past  
14 functions, duties, activities, and responsibilities (**“Duties”**) and the Duties of the Unit in which  
15 they work or worked; (vi) their present or last known place of employment; and (vii) the  
16 geographic location/address where they worked while holding each title/position otherwise  
17 identified (**“Working History”**);

18           b.       with respect to non-natural Person(s), organizational Person(s), or Units: (i) their  
19 full name; (ii) their present or last known address; (iii) their place in the organization’s  
20 structure/hierarchy over time including Reporting Relationships, Supervisory Relationships, and  
21 all changes thereto; (iv) their present and past Duties; and (v) their personnel, managers,  
22 supervisors and decision-makers, and any changes thereto over time;

23           c.       with respect to a document, its Bates number (including pin cites, as applicable),  
24 its title, its date, its location, its signatory, any authors and recipients, its description (e.g.,  
25 memorandum, letter, contract, form), and the number of pages; and

26           d.       with respect to a number, the number as known to You with the greatest degree of  
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1 precision available to You, and the source(s) of that number, including Persons and documents.

2 7. **“Including”** means “including, without limitation” and “including but not limited  
3 to.”

4 8. **“Model Feature”** means any data input into a machine-learning model, including  
5 but not limited to user information (including but not limited to: user gender, age, region), video  
6 information (including but not limited to: video length, content type/taste cluster, number of  
7 interactions), and author information (including but not limited to: author age, region, follower  
8 count).

9 9. **“Named Feature”** means any feature of Your platform identified in ¶¶ 845 and  
10 864 of the Second Amended Master Complaint, ECF No. 494.

11 10. **“Person”** or **“Persons”** means any natural person, corporation, company,  
12 partnership, proprietorship, association, governmental or nongovernmental entity, agency,  
13 organization, or group, as well as any other business entity or association.

14 11. **“Policy”** or **“Policies”** mean all formal and informal policies, practices, guidelines,  
15 protocols, procedures, plans, systems, customs, or manners of conducting a specific task that are  
16 or were adopted, implemented, or used by You; and for each of the foregoing the terms, methods  
17 and means of implementation, and Identity of Persons responsible for their management and  
18 implementation.

19 12. **“Relating to,” “relate to,” “referring to,” “refer to,” “reflecting,” “reflect,”**  
20 **“concerning,”** or **“concern”** shall mean evidencing, regarding, concerning, discussing,  
21 embodying, describing, summarizing, containing, constituting, showing, mentioning, reflecting,  
22 pertaining to, dealing with, involving, embodying, evaluating, reviewing, reporting on,  
23 commenting on, relating to, referring to in any way or manner, or impacting or connecting in any  
24 way logically or factually with the subject matter of the Request.

25 13. **“TikTok Platform”** or **“TikTok”** means any version of the TikTok platform  
26 developed, tested, or made available for use, including versions for use on mobile devices or by  
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1 accessing a URL on the internet, with or without logging into an account, and including all features  
2 or surfaces accessible to some or all users of the platform.

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4 14. “**Teen**” or “**Teens**” means individuals between the ages of thirteen (13) and  
5 seventeen (17), inclusively.

6 15. “**You**,” “**Your**,” “**Defendant**,” or “**Defendants**” means the above-named  
7 Responding Party or Parties (individually and, where applicable, collectively); each of their  
8 predecessor or successor business entities; each foreign or domestic governmental,  
9 nongovernmental, or private corporation or entity with which they are commonly owned, including  
10 subsidiaries and parent corporations; each of their former or present Units; and for each of the  
11 foregoing all former or present directors, officers, members, partners, principals, employees,  
12 contractors, agents, attorneys, experts, investigators, consultants, or other persons authorized to  
13 act on their behalf.

14 16. “**Youth**” means individuals under the age of twenty-two (22).

15 **II. RULES OF CONSTRUCTION**

16 1. “Any,” “all,” and “each” shall be construed as any, all, and each.

17 2. The words “and/or,” “or” and “and” are used inclusively, not exclusively. As such,  
18 “and/or,” “or” and “and” should be construed so as to require the broadest possible response. If,  
19 for example, a request calls for information about “A or B” or “A and B,” You should produce all  
20 information about A and all information about B, as well as all information about A and B  
21 collectively.

22 3. The singular form of a noun or pronoun includes the plural form and vice versa.

23 4. The use of any tense of any verb shall also include all other tenses of that verb.

24 5. A term or word defined herein is meant to include both the lower and upper case  
25 reference to such term or word.

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2 6. Any Bates number referenced in these Requests shall be construed to refer not only  
3 to the specific page number identified but to the entirety of the document associated with that Bates  
4 number, inclusive of family members.

5 **III. INSTRUCTIONS**

6 1. In responding to these Interrogatories, You shall furnish all information in Your  
7 possession, custody, care, or control, including that which is available to You via reasonable  
8 inquiry to their employees, agents, or any person subject to Your control.

9 2. The duty to furnish information shall not be limited or affected by the availability  
10 of the same information through another source. All information not subject to objection and  
11 known by, possessed by, or controlled by You (including through Your employees, agents, or any  
12 person subject to their control) shall be furnished.

13 3. If You respond to any Interrogatory with the production of business records, such  
14 records shall be produced in accordance with the terms of Federal Rules of Civil Procedure Rule  
15 34 and any applicable orders or agreements among the parties governing the production of  
16 Documents, in the above-captioned case.

17 4. If any document that You would have identified in response to any Interrogatory  
18 was, but is no longer, in Your possession or subject to Your control, You must identify the  
19 Document, the reason for its loss, destruction, or unavailability, the name of each person known  
20 or reasonably believed by You to have present possession, custody, or control of the original and  
21 any copy thereof (if applicable), and a description of the disposition of each copy of the Document.

22 5. If You assert an objection to any Interrogatory, You must nonetheless respond and  
23 identify any information that is not subject to the stated objection. If You object to part of an  
24 Interrogatory, You must specify the portion of the Interrogatory to which You object, and must  
25 identify information responsive to the remaining parts of the Interrogatory. To the extent You  
26 object to any Interrogatory or portion thereof, You shall state with specificity Your grounds for  
27 objecting to that Interrogatory or portion thereof, state whether you are refusing to provide an  
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1 answer, and identify any information withheld based on such objection. It is not appropriate to  
2 simply object to any Interrogatory in its entirety and invite a conference of counsel.  
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4 6. If a response to any requested Interrogatory is objected to on the grounds that the  
5 Request is unduly burdensome, specifically describe the burden or expense associated with the  
6 response.

7 7. Insofar as You may object to an Interrogatory as vague, ambiguous, otherwise  
8 difficult to understand, or subject to multiple interpretations, not all of which You believe are  
9 objectionable, Plaintiffs are willing to meet and confer in advance of Your deadline to respond to  
10 these Interrogatories to assist in providing clarity as to the nature and scope of information  
11 requested.

12 8. If You assert that a portion of a response is privileged or otherwise protected from  
13 disclosure, You shall identify the basis for that privilege and fully respond to the remaining portion  
14 of the Interrogatory that does not call for privileged information.

15 9. These Interrogatories are continuing in nature and require prompt supplemental  
16 response(s) whenever responsive information not previously furnished by You is obtained by You.

17 10. Unless otherwise indicated, the relevant time period for the information sought is  
18 from the date You first researched, designed, or developed Your social media platform or any of  
19 its predecessors to the present.

20 11. To the extent that information requested is not within Your personal knowledge,  
21 but as to which You have been informed or have formed a belief, state that such information is  
22 furnished on information and/or belief and state the source of the information and the grounds of  
23 Your belief.

24 12. The relevant time period for these interrogatories starts from the date You first  
25 researched, designed, or developed Your Platform or any of its predecessors, including Musical.ly,  
26 to the present.  
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13. Please answer each interrogatory separately for each year included in the relevant time period.

14. All references to defined terms shall have the same meaning regardless of whether they are capitalized.

#### IV. INTERROGATORIES

**Interrogatory No. 25:** Please itemize and describe each type of user interaction and other Model Feature used by You to retrieve content from a Candidate Pool on the TikTok Platform. For purposes of this request, “itemize and describe” means to identify the interaction or Model Feature by both its plain language names and any alphanumeric code, the date You created the Model Feature, the Identity of the Person who created the Model Feature, the Identity of the Person or Team responsible for maintaining the Model Feature, the purpose for which the Model Feature was created, and the weight given to the Model Feature at any given time.

**Interrogatory No. 26:** Please itemize and describe each type of user interaction and other Model Feature used by You in Your prediction and value models to rank content on the TikTok Platform. For purposes of this request, “itemize and describe” means to identify the interaction or Model Feature by both its plain language names and any alphanumeric code, the date You created the Model Feature, the Identity of the Person who created the Model Feature, the Identity of the Person or Team responsible for maintaining the Model Feature, the purpose for which the Model Feature was created, and the weight given to the Model Feature at any given time.

Dated: November 14, 2024

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail on Thursday, November 14, 2024 to the following, Counsel for Defendants TikTok, Ltd.; TikTok, LLC; TikTok, Inc.; ByteDance, Ltd.; and ByteDance Inc.

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